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Attorney for Secured Creditor
U.S. Bank Trust National Association, as Trustee for the Igloo Series III Trust, its successors
and/or assignees

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In Re:)	CASE NO.: 19-30291
)	
JOHN DENTONI)	CHAPTER 13
)	
Debtor (s).)	CONDITIONAL NON-
)	OPPOSITION TO MOTION TO
)	SELL

1 TO ALL PARTIES IN INTEREST AND TO THEIR ATTORNEYS OF RECORD:

2 U.S. Bank Trust National Association, as Trustee for the Igloo Series III Trust, its
3 successors and/or assignees, ("Secured Creditor") in the above-entitled Bankruptcy
4 proceeding, hereby submits the following Objections to Confirmation of the Chapter 13 Plan
5 proposed by ("Debtor") John Dentoni.

6 Secured Creditor is entitled to receive payments pursuant to a Promissory Note which
7 matures on 7/1/2035 and is secured by a First Deed of Trust on the subject property commonly
8 known as 724 Miller Ave., South San Francisco, CA 94080-2527 ("Property").

9 Pursuant to 11 U.S.C. § 363(f) Secured Creditor is entitled to the full payment of their
10 claim. Secured Creditor has no Opposition to Debtor's Motion to Sell the Subject Property so
11 long as the lien of Secured Creditor is paid off in full satisfaction of the debt.

12 Based upon the foregoing, Secured Creditor respectfully requests any order granting
13 Debtor's Motion to sell include the below language:

14 The loan secured by a first lien on real property located at 724 Miller
15 Avenue, South San Francisco, CA 94080-2527 will be paid in full as of the
16 date of the closing of the sale, and the sale will be conducted through an
17 escrow and based on a non-expired contractual payoff statement received
18 directly from U.S. Bank Trust National Association, as Trustee for the Igloo
19 Series III Trust and its servicing agent, BSI Financial Services.

20
21 Dated: May 3, 2019

GHIDOTTI | BERGER LLP

22
23 /s/ Kristin A. Zilberstein
24 Kristin A. Zilberstein, Esq.
25 Counsel for U.S. Bank Trust National
26 Association, as Trustee for the Igloo Series III
27 Trust, its successors and/or assignees
28

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11 Attorney for Creditor

12 U.S. Bank Trust National Association, as Trustee for the Igloo Series III Trust, its successors
13 and/or assignees

14 UNITED STATES BANKRUPTCY COURT
15 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

16 In Re:) CASE NO.: 19-30291

17 John Dentoni,) CHAPTER 13

18 Debtor.) **CERTIFICATE OF SERVICE**

19 **CERTIFICATE OF SERVICE**

20
21 I am employed in the County of Orange, State of California. I am over the age of
22 eighteen and not a party to the within action. My business address is: 1920 Old Tustin
23 Avenue, Santa Ana, CA 92705.

24 I am readily familiar with the business's practice for collection and processing of
25 correspondence for mailing with the United States Postal Service; such correspondence would
26 be deposited with the United States Postal Service the same day of deposit in the ordinary
27 course of business.
28

On May 3, 2019 I served the following documents described as:

- CONDITIONAL NON-OPPOSITION TO MOTION TO SELL**

on the interested parties in this action by placing a true and correct copy thereof in a sealed envelope addressed as follows:

(Via United States Mail)

Debtor John Dentoni 724 Miller Ave South San Francisco, CA 94080	Trustee David Burchard P.O. Box 8059 Foster City, CA 94404
Debtor's Counsel Richard L. Sturdevant Financial Relief Law Center 1200 Main St. #G Irvine, CA 92614	U.S. Trustee Office of the U.S. Trustee / SF Phillip J. Burton Federal Building 450 Golden Gate Ave. 5th Fl., #05-0153 San Francisco, CA 94102

xx (By First Class Mail) At my business address, I placed such envelope for deposit with the United States Postal Service by placing them for collection and mailing on that date following ordinary business practices.

 Via Electronic Mail pursuant to the requirements of the Local Bankruptcy Rules of the Eastern District of California

xx (Federal) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 3, 2019 at Santa Ana, California

/s/ Enrique Alarcon
Enrique Alarcon